

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ROBERT HUGHES

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Violations: Title 18, United States  
Code, Sections 922(a)(5),922(d)(1),  
and 1001(a)(2)

**COUNT ONE**

The SPECIAL FEBRUARY 2011-2 GRAND JURY charges:

On or about December 9, 2010, at Chicago, in the Northern District of Illinois, Eastern  
Division, and elsewhere,

ROBERT HUGHES,

defendant herein, did knowingly transfer, sell, trade, give, transport and deliver a firearm, namely,  
a Desert Eagle .44 caliber pistol, bearing serial number 30462, to Individual A, knowing and having  
reasonable cause to believe that Individual A did not reside in the State in which defendant resided;

In violation of Title 18, United States Code, Sections 922(a)(5).

**COUNT TWO**

The SPECIAL FEBRUARY 2011-2 GRAND JURY charges:

On or about December 9, 2010, at Chicago, in the Northern District of Illinois, Eastern  
Division,

**ROBERT HUGHES,**

defendant herein, did knowingly sell and dispose of a firearm, namely, a Desert Eagle .44 caliber  
pistol, bearing serial number 30462, knowing and having reasonable cause to believe that Individual  
A had been convicted of a crime punishable by imprisonment for a term exceeding one year;

In violation of Title 18, United States Code, Sections 922(d)(1).

**COUNT THREE**

The SPECIAL FEBRUARY 2011-2 GRAND JURY charges:

On or about January 27, 2011, at Chicago, in the Northern District of Illinois, Eastern  
Division,

**ROBERT HUGHES,**

defendant herein, did knowingly transfer, sell, trade, give, transport and deliver a firearm, namely,  
a Charter 2000 Bulldog .44 caliber revolver, bearing serial number 19416, to Individual A, knowing  
and having reasonable cause to believe that Individual A did not reside in the State in which  
defendant resided;

In violation of Title 18, United States Code, Sections 922(a)(5).

**COUNT FOUR**

The SPECIAL FEBRUARY 2011-2 GRAND JURY charges:

On or about December 9, 2010, at Chicago, in the Northern District of Illinois, Eastern  
Division,

**ROBERT HUGHES,**

defendant herein, knowingly sell and dispose of a firearm, namely, a Charter 2000 Bulldog .44  
caliber revolver, bearing serial number 19416, knowing and having reasonable cause to believe that  
Individual A had been convicted of a crime punishable by imprisonment for a term exceeding one  
year;

In violation of Title 18, United States Code, Sections 922(d)(1).

## COUNT FIVE

The SPECIAL FEBRUARY 2011-2 GRAND JURY charges:

1. In 2010, the Bureau of Alcohol, Tobacco, Firearms and Explosives was investigating the possession, purchase and sale of firearms relating to the Wheels of Souls Outlaw Motorcycle Gang. As of March 7, 2011, the following matters, among others, were material to this investigation:

a. Whether ROBERT HUGHES sold and supplied firearms to members of the Wheels of Souls Outlaw Motorcycle Gang;

b. Whether ROBERT HUGHES had sold a Desert Eagle .44 caliber pistol, bearing serial number 30462, to Individual A on December 9, 2010 in the parking lot of a Home Depot store in Chicago, Illinois; and

c. Whether ROBERT HUGHES had sold a Charter 2000 Bulldog .44 caliber revolver, bearing serial number 19416, to Individual A on January 27, 2011, in the parking lot of a Home Depot store in Chicago, Illinois;

2. On or about March 7, 2011, at Lansing, in the Northern District of Illinois, Eastern Division,

ROBERT HUGHES,

defendant herein, did knowingly and willfully make materially false, fictitious, and fraudulent statements and representations in a matter within the jurisdiction of the United States Department of Justice Bureau of Alcohol, Tobacco, Firearms and Explosives, an agency within the executive branch of the Government of the United States, when ROBERT HUGHES, interviewed by agents of the Bureau of Alcohol, Tobacco, Firearms and Explosives, stated in sum and substance that:

- (i) ROBERT HUGHES had traded a Desert Eagle .44 caliber pistol, bearing serial number 30462, for another firearm with an individual unknown to ROBERT HUGHES at a gun show in Indiana in February 2010; and
- (ii) ROBERT HUGHES sold a Charter 2000 Bulldog .44 caliber revolver, bearing serial number 19416, to an individual unknown to ROBERT HUGHES at a gun show in Indiana;

Whereas, in truth and in fact, as ROBERT HUGHES then well knew, these statements were false;

In violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY